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RTZ ASSOCIATES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

INTUSCARE INC.,  
  
Plaintiff,  
  
v.  
  
RTZ ASSOCIATES, INC.; and DOES 1  
through 10,  
  
Defendants.

Case No. 4:24-cv-1132-JST

Assigned to: Hon. Jon S. Tigar

**JOINT STIPULATION TO CONTINUE  
DISCOVERY DEADLINES;  
[PROPOSED] ORDER THEREON**

Complaint Filed: February 23, 2024  
Amended Complaint Filed: April 2, 2024  
Counterclaims Filed: June 20, 2024

1 Plaintiff IntusCare Inc. (“Intus” or “Plaintiff”) and Defendant RTZ Associates, Inc. (“RTZ”  
2 or “Defendant”), by and through their respective counsel, enter into the following stipulation:

3 WHEREAS, on February 23, 2024, Intus filed its Complaint against RTZ;

4 WHEREAS, on April 2, 2024, Intus filed its Amended Complaint against RTZ;

5 WHEREAS, on June 20, 2024, RTZ filed its Counterclaims against Intus;

6 WHEREAS, on June 14, 2024, the Court entered a scheduling order;

7 WHEREAS, a jury trial is currently scheduled to begin on January 12, 2026 at 8:00 a.m.;

8 WHEREAS, on May 12, 2025, the Court granted the parties’ first stipulation to continue  
9 discovery deadlines;

10 WHEREAS, discovery deadlines are currently set for the following dates:

11 1. Fact Discovery Cut-off: August 4, 2025

12 2. Expert Disclosures: August 25, 2025

13 3. Expert Rebuttal: September 15, 2025

14 4. Expert Discovery Cut-off: October 6, 2025

15 WHEREAS, the parties have been diligent both in propounding and producing discovery in  
16 a timely manner. Depositions have begun and will continue throughout August, September, and  
17 October. The parties do not at this time anticipate bringing any additional dispositive motions  
18 (beyond Intus’ currently pending Motion for Summary Judgment), so the requested continuance of  
19 the discovery dates is not expected to result in any new dispositive motions and is not expected to  
20 affect the parties’ ability to prepare for and proceed with a January 12, 2026 trial date. The proposed  
21 dates do not prejudice either party to appear at trial on the noticed and scheduled dates.

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1 NOW, THEREFORE, the parties stipulate and agree to continue the expert disclosure and  
2 rebuttal deadlines by 21 days, the expert discovery cut-off by 26 days, and the fact discovery cut-  
3 off by 90 days, as follows:

- 4 1. Expert Disclosures: September 15, 2025
- 5 2. Expert Rebuttal: October 6, 2025
- 6 3. Fact and Expert Discovery Cut-off: October 31, 2025

7  
8 Dated: August 5, 2025

MANATT, PHELPS & PHILLIPS, LLP

9  
10 By: /s/ Charles E. Weir

11 Charles E. Weir  
12 Andrew Beshai

13 *Attorneys for Plaintiff*  
14 INTUS CARE, INC.

15  
16 Dated: August 5, 2025

NOSSAMAN LLP

17 By: /s/ Kasia Penn

18 David C. Lee  
19 Kasia Penn

20 *Attorneys for Defendant*  
21 RTZ ASSOCIATES, INC.

**[PROPOSED] ORDER**

The Court, having reviewed and considered the Parties' Joint Stipulation to Continue  
Discovery Deadlines, hereby ORDERS THAT:

1. Expert Disclosures: September 15, 2025
2. Expert Rebuttal: October 6, 2025
3. Fact and Expert Discovery Cut-off: October 31, 2025

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: August 5, 2025

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Hon. Jon. S. Tigar  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2025, I caused to be electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF system and that all counsel of record will be served via the Notice of Electronic Filing generated by CM/ECF.

/s/ Regina Coprich  
Regina Coprich